

FILED

November 06, 2024

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
EL PASO DIVISION**

CLERK, U.S. DISTRICT COURT
WESTERN DISTRICT OF TEXAS
By: DT
Deputy

UNITED STATES OF AMERICA,**Plaintiff,****v.**

**RR GOYAKLA APACHE,
also known as (a.k.a.),
Ronald Ricardo Goyakla Apache,**

Defendant.**Case No: EP:24-CR-02534-KC****INDICTMENT**

**CT 1: 18 U.S.C. § 2252(a)(2)—Receipt of a
Visual Depiction Involving the Sexual
Exploitation of a Minor**

**CT 2: 18 U.S.C. §§ 2252(a)(4)(B) & (b)(2)
Possession of a Visual Depiction Involving
the Sexual Exploitation of a Minor
(Prepubescent/Under 12 Years of Age)**

***Notice of Government's Demand for
Forfeiture***

THE GRAND JURY CHARGES THAT:

COUNT ONE

**Receipt of a Visual Depiction
Involving the Sexual Exploitation of a Minor**

Beginning on or about August 6, 2023, and continuing to and including November 3, 2023,
in the Western District of Texas, the Defendant,

**RR GOYAKLA APACHE,
also known as (a.k.a.),
Ronald Ricardo Goyakla Apache,**

did knowingly receive any visual depiction using any means or facility of interstate or foreign commerce that had been transported in or affecting interstate or foreign commerce, by any means including by computer, the production of which involved the use of a minor engaging in sexually explicit conduct and which visual depiction was of such conduct, all in violation of Title 18, United States Code, Sections 2252(a)(2) and (b)(1).

COUNT TWO
Possession of Child Pornography)
[Prepubescent/Under 12 Years of Age]

On or about November 15, 2023, in the Western District of Texas, the Defendant,

RR GOYAKLA APACHE,
also known as (a.k.a.),
Ronald Ricardo Goyakla Apache,

did knowingly possess at least one matter which contains any visual depiction, the production of which involved the use of a minor engaging in sexually explicit conduct as defined in Title 18, United States Code, Section 2256(2), which visual depiction had been transported using any means and facility of interstate and foreign commerce, had been transported in interstate and foreign commerce, and was produced using materials which had been shipped and transported using any means and facility of interstate and foreign commerce, including by computer, and the production of which involved the use of a minor engaging in sexually explicit conduct, said minor being prepubescent and having not attained the age of 12 years, and such visual depiction was of such conduct, all in violation of Title 18, United States Code, Sections 2252(a)(4)(B) and (b)(2).

NOTICE OF GOVERNMENT'S DEMAND FOR FORFEITURE
[See Fed. R. Crim. P. 32.2]

I.

Receipt and Possession of a Visual Depiction Involving the
Sexual Exploitation of a Minor Violation and Forfeiture Statutes
[Title 18 U.S.C. §§ 2252(a)(2), (b)(1), (a)(4)(B), and (b)(2) subject to
criminal forfeiture pursuant to Title 18 U.S.C. §§ 2253(a)(1), (2) and (3)]

As a result of the foregoing criminal violations set forth above, the United States of America gives notice to Defendant **RR GOYAKLA APACHE, also known as (a.k.a.), Ronald Ricardo Goyakla Apache,** of its intent to seek the forfeiture of the property described below upon

conviction and pursuant to Fed. R. Crim. P. 32.2 and Title 18 U.S.C. §§ 2253(a)(1), (2), and (3), which state:

Title 18 U.S.C. § 2253. Criminal forfeiture

(a) Property subject to criminal forfeiture. -A person who is convicted of an offense under this chapter involving a visual depiction described in section 2251, 2251A, 2252, 2252A, or 2260 of this chapter or who is convicted of an offense under section 2251B of this chapter, or who is convicted of an offense under chapter 109A, shall forfeit to the United States such person's interest in-

(1) any visual depiction described in section 2251, 2251A, 2252, 2252A, or 2260 of this chapter, or any book, magazine, periodical, film, videotape, or other matter which contains any such visual depiction, which was produced, transported, mailed, shipped or received in violation of this chapter;

(2) any property, real or personal, constituting or traceable to gross profits or other proceeds obtained from such offense; and

(3) any property, real or personal, used or intended to be used to commit or to promote the commission of such offense or any property traceable to such property.

This Notice of Demand for Forfeiture includes but is not limited to the property described below in Paragraph II.

II.
Property

1. iPhone with S/N M60KW36HG2 and IMEI 359188100386143;
2. iMac with S/N W84493CTPNZ;
3. Any and all other property and/or accessories involved in or used in the commission of the criminal offense; and
4. Any and all other property involving any visual depiction described in section 2251, 2251A, or 2252, 2252A, 2252B, or 2260.

A TRUE BILL.

FOREPERSON OF THE GRAND JURY

JAIME ESPARZA
UNITED STATES ATTORNEY

BY:

Nalley A. Lariosa
Assistant U.S. Attorney